

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

IN RE: TERRORIST ATTACKS ON :
SEPTEMBER 11, 2001 : **03-MDL-1570 (GBD)(SN)**

This Document Relates To:

Ashton, et al. v. al Qaeda Islamic Army, et al., Case No. 02-cv-6977 (GBD)(SN)

Bauer, et al. v. al Qaeda Islamic Army, et al., Case No. 1:02-cv-07236 (GBD)(SN)

Ryan, et al. v. Islamic Republic of Iran, et al., Case No. 1:20-cv-00266 (GBD)(SN)

**DECLARATION OF DENNIS G. PANTAZIS IN SUPPORT OF
MOTION FOR ENTRY OF PARTIAL FINAL DEFAULT JUDGMENTS**

DENNIS G. PANTAZIS, Esquire, hereby states under penalty of perjury that:

1. The form of this motion and the relief requested herein are intended to comply with the Court's prior Orders, including specifically the Court's order of January 11, 2017, MDL Doc. No. 3422.

2. I am an attorney with the law firm of Wiggins Childs Pantazis Fisher Goldfarb LLC, attorneys for Plaintiffs Patricia Ryan, Personal Representative of the Estate of John J. Ryan, Deceased, Patricia Ryan (individually in her own right), Kristen Ryan, Laura Ryan, Colin Ryan, Katherine Maher, Personal Representative of the Estate of Daniel L. Maher, Deceased, Katherine Maher (individually in her own right), Daniel R. Maher, and Joseph F. Maher, in the above-captioned matters.

3. This Motion is intended to supplant and substitute for the motion papers filed at MDL Doc. No.7643, which said Plaintiffs withdraw.

4. I submit this Declaration in support of this motion on behalf of Plaintiffs Patricia Ryan, Personal Representative of the Estate of John J. Ryan, Deceased, Patricia Ryan (individually in her own right), Kristen Ryan, Laura Ryan, Colin Ryan, Katherine Maher, Personal Representative of the Estate of Daniel L. Maher, Deceased, Katherine Maher (individually in her

own right), Daniel R. Maher, and Joseph F. Maher, in the actions styled *Bauer, et al. v. al Qaeda Islamic Army, et al.*, Case No. 1:02-cv-07236), a member case in *Ashton, et al. v. al Qaeda Islamic Army, et al.*, Case No. 02-cv-6977 (GBD)(SN), which are cases in this above-captioned MDL proceedings, *In Re: Terrorist Attacks on September 11, 2001*, 03-MDL-1570 (GBD)(SN).

5. The form of this motion and the relief requested herein are intended to comply with the Court's prior Orders, including specifically the Court's order of January 11, 2017, MDL Doc. No. 3422.

6. I have complied with the due diligence safeguards referenced in Section II.D. of the January 23, 2017, letter from the Plaintiffs' Executive Committees (MDL Doc. No. 3433).

7. I affirm that, after review of the matter by myself and attorneys affiliated with me in this action, I have personally verified that the relief sought on behalf of Plaintiffs Patricia Ryan, Personal Representative of the Estate of John J. Ryan, Deceased, Patricia Ryan, Kristen Ryan, Laura Ryan, Colin Ryan, Katherine Maher, Personal Representative of the Estate of Daniel L. Maher, Deceased, Katherine Maher, Daniel R. Maher, and Joseph F. Maher, against the Taliban have not been awarded or requested in this or any other proceeding.

8. The form of this motion and the relief requested herein are also consistent with the form and relief requested and granted as to other Plaintiffs in this action.

9. The Motion, proposed Order, and this Declaration note that this case relates to *Ryan, et al. v. Islamic Republic of Iran, et al.*, as well as *Ashton* and *Bauer* because, while the instant Plaintiffs are parties in *Bauer/Ashton*, the economic damages figures for the two Estates derive from this Court's rulings in *Ryan*.

10. These papers are being filed in the MDL and spread to the *Bauer, Ashton*, and *Ryan* dockets; it is anticipated that these Plaintiffs will file a request for a transfer of these Plaintiffs'

judgments to *Ryan*, as was previously done in regard to their judgments against the Islamic Republic of Iran and certain other Iran-related entities.

Date: March 16, 2022

/s/ Dennis G. Pantazis
Dennis G. Pantazis (AL Bar No. ASB-2216-A59D)
WIGGINS CHILDS PANTAZIS (*Lead Counsel*)
FISHER GOLDFARB LLC
The Kress Building
301 Nineteenth Street North
Birmingham, Alabama 35203
(205) 314-0500
dgp@wigginschilds.com

Attorney for Plaintiffs Patricia Ryan, Personal Representative of the Estate of John J. Ryan, Deceased, Patricia Ryan, Kristen Ryan, Laura Ryan, Colin Ryan, Katherine Maher, Personal Representative of the Estate of Daniel L. Maher, Deceased, Katherine Maher, Daniel R. Maher, and Joseph F. Maher